

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
KANSAS CITY DIVISION**

UNITED STATES OF AMERICA

v.

MIRZA M. REAZUDDIN

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4:23-CR-00067-BP-1

**UNOPPOSED MOTION TO SEND VOLUMINOUS DISCOVERY VIA EXTERNAL
THUMB DRIVE**

Mr. Sami Azhari of Azhari, LLC, the law firm representing Mirza Reazuddin, respectfully moves this Court to allow him to send voluminous discovery materials to Mr. Reazuddin via external thumb drive, and states the following:

1. Discovery in this matter is extremely voluminous.
2. Undersigned counsel attempted to send paper copies of discovery to Mr. Reazuddin via United States Postal Service in September 2023, to USP Leavenworth in Kansas, where he is currently housed, but this delivery was rejected by the facility for reasons unknown to undersigned counsel.
3. Undersigned counsel is located in Chicago, Illinois and unable to meet with Mr. Reazuddin in person to review discovery in a timely fashion.
4. To ensure that Mr. Reazuddin is able to review discovery in a timely fashion, undersigned counsel respectfully requests permission to load discovery onto an external thumb drive and mail to Mr. Reazuddin.
5. The Government does not oppose this Motion.

WHEREFORE, undersigned counsel, Sami Azhari, respectfully requests that this Court grant his request to allow him to send discovery materials to Mr. Reazuddin via external thumb drive, and for such other and further relief as is appropriate under the circumstances.

October 12, 2023

Respectfully Submitted,

/s/Sami Azhari
Sami Azhari, attorney for Mirza Reazuddin

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CERTIFICATE OF SERVICE

The undersigned states that, on October 17, 2023, he caused the above to be served on counsel of record by way of ECF filing.

Respectfully submitted,

/s/Sami Azhari

Sami Azhari

Attorney for Mirza Reazuddin